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9/6/01

**IN THE UNITED STATES DISTRICT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>BEVERLY BEAM</b>	<b>) CIVIL ACTION LAW</b>	
	<b>)</b>	
	<b>)</b>	
<b>Plaintiff</b>	<b>)</b>	<b>FILED</b>
	<b>)</b>	<b>HARRISBURG</b>
<b>vs.</b>	<b>)</b>	<b>SEP 05 2001</b>
	<b>)</b>	
<b>SCOTT DOWNEY, ROGER</b>	<b>)</b>	<b>MARY E. D'ANDREA, CLERK</b>
<b>MORRISON, DAVID</b>	<b>)</b>	<b>Per _____ AK</b>
<b>GRAYBILL AND MICHAEL</b>	<b>)</b>	<b>DEPUTY CLERK</b>
<b>SWEGER</b>	<b>)</b>	
<b>Defendants</b>	<b>)</b>	
	<b>)</b>	

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1:CV-01-0600  
*J McLean*

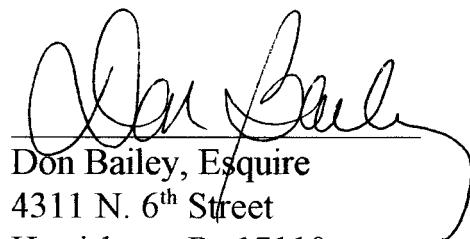
**JURY TRIAL DEMANDED**

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME**

- 1.) On or about November 1, 2001 discovery ends in the above captioned matter.
- 2.) Plaintiff's counsel has been unable to depose the defendants as of this date and has only been able to schedule the deposition of Roger Morrison at the end of October 2001 because of defendants scheduling problems. Plaintiff has to conclude the depositions of the defendants and we have additional witnesses that also need to be deposed.
- 3.) Opposing counsel was notified and P. Daniel Altland, Esquire and Steven Schiffman Esq. do concur in this motion. Steven Russell was notified but counsel was unable to elicit a response from him.

**WHEREFORE** the plaintiff is requesting a 120-day enlargement of time of the discovery period until March 1, 2001 and to advance the case management plan accordingly.

Respectfully Submitted,

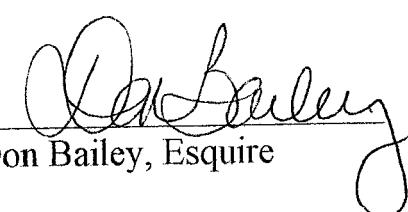


Don Bailey, Esquire  
4311 N. 6<sup>th</sup> Street  
Harrisburg, Pa 17110  
(717) 221-9500

September 3, 2001

**CERTIFICATE OF CONCURRENCE/NON CONCURRENCE**

I, Don Bailey contacted all counsel regarding the concurrence or non-concurrence of the Motion for Enlargement of Time. P. Daniel Altland Esq., and Steven Schiffman Esq., do concur. I was unable to reach Stephen Russell Esq., for his concurrence.

  
\_\_\_\_\_  
Don Bailey, Esquire

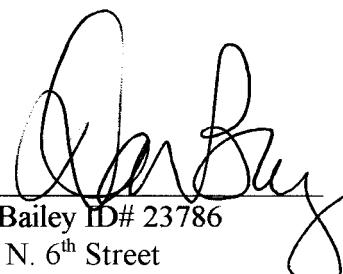
**CERTIFICATE OF SERVICE**

I hereby certify that on this **September 3, 2001** true and correct copy of the foregoing  
**MOTION FOR ENLARGEMENT OF TIME** was served upon the following counsel of record  
by United States Mail, postage prepaid:

**Stephen Russell, Esquire**  
**Stock and Leader**  
35 S. Duke Street  
P.O. Box 5167  
York, PA 17405-5167

**Steven Schiffman, Esquire**  
**Serratelli, Schiffman, Brown and Calhoun, P.C.**  
2080 Linglestown Road  
Harrisburg, PA 17110

**Daniel P. Altland, Esquire**  
**Mette, Evans and Woodside**  
3401 N. Front Street  
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BY:   
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